IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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) NO: 08 C 439
) JUDGE CASTILLO
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) MAGISTRATE BROWN
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MOTION FOR EXTENSION OF TIME

Defendant, LIFE INSURANCE COMPANY OF NORTH AMERICA ("LINA"), by its attorneys, Daniel K. Ryan and Peter E. Pederson, moves for a 28 day extension of time, up to March 11, 2008, in which to answer plaintiff's complaint, stating as follows:

- 1. On January 23, 2008, plaintiff served LINA with process through the Division of Insurance of the Illinois Department of Financial and Professional Regulation. On February 5, 2008, LINA received the complaint and summons from the Department, making LINA's responsive pleading due February 25, 2008 under the Illinois Insurance Code. This motion is timely.
- 2. LINA respectfully seeks a 28 day extension to file its response to the complaint. The time is necessary for undersigned counsel to obtain the administrative record regarding plaintiff's claim, which is maintained out-of-state, and prepare an appropriate responsive pleading based upon their analysis of the record.

WHEREFORE, LIFE INSURANCE COMPANY OF NORTH AMERICA respectfully requests that this Honorable Court grant it a 28 day extension of time, up to March 11, 2008, in which to answer or otherwise plead to plaintiff's complaint.

Daniel K. Ryan Peter E. Pederson HINSHAW & CULBERTSON LLP 222 N. LaSalle Street, Suite 300 Chicago, Illinois 60601 (312) 704-3000

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LIFE INSURANCE COMPANY OF NORTH AMERICA

By: /s/ Peter E. Pederson
One of its Attorneys

CERTIFICATE OF SERVICE

I, Daniel K. Ryan the undersigned attorney, certify that on February 12, 2008 I served this MOTION FOR EXTENSION OF TIME by filing it with the Court's CM/ECF system, which will make copies of the documents available to all counsel of record:

/s/ Peter E. Pederson

Service List

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